

April 2, 2002

VIA ELECTRONIC FILING

Mr. Tom Sugrue
Chief, Wireless Telecommunications Bureau
Ms. Dorothy Attwood
Chief, Wireline Competition Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Number Portability Administration Center Readiness Issues
WT Docket No. 01-184

Dear Mr. Sugrue and Ms. Attwood:

On Thursday, March 28, 2002, CTIA filed a letter with you asserting that the Number Portability Administration Center (NPAC) is unable to handle the volume of number ports that will result from implementation of wireless number portability.¹ NeuStar, Inc., as the Local Number Portability Administrator, is sending this letter to you to respond to the assertions contained in the March 28 CTIA Letter and clarify the technical issues that were the topic of the March 25, 2002 meeting of the Local Number Portability Administration Working Group (LNPA WG).

March 25 Meeting of the LNPA Working Group

On March 25, the LNPA WG held a meeting to discuss certain issues that the carriers did not want to wait to discuss until the next regularly scheduled monthly meeting.² The purpose of this meeting was not, in fact, to discuss NPAC-generated problems.³ The agenda for the meeting, contrary to CTIA's assertions, was not to focus on the ability of the NPAC to handle the volume of transactions that will result from wireless number portability. Rather, the meeting was held to address issues relating to the ability of some carriers to handle and process large quantities of data in a recovery situation. A recovery situation might include a carrier taking its network offline in the normal course of operations or an outage of a carrier's Operations Support System (OSS).

¹ Letter, dated March 28, 2002, to Mr. Tom Sugrue, Chief, Wireless Telecommunications Bureau and Ms. Dorothy Attwood, Chief, Wireline Competition Bureau, Federal Communications Commission, from Michael Altschul, Senior Vice President for Policy and Administration and General Counsel, CTIA (the March 28 CTIA Letter).

² The LNPA WG meets monthly. Meetings that are held outside of the regularly scheduled events are often labeled emergency meetings, regardless of the issues to be discussed.

³ See *ex parte* filing of VoiceStream Wireless Corporation, WT Docket No. 01-104, March 28, 2002 at page 3 (the March 28 VoiceStream Filing).

In certain instances, carriers have experienced problems downloading a large backlog of data during a recovery situation at any one time. This backlog in data occurs when a carrier's system goes down for some period and data from the NPAC, which continues to be processed, builds up. If the carrier's system is down for a long period, the NPAC-generated data may become voluminous and difficult for certain carriers' Service Management Systems (SMSs) to download. While this issue is one that directly involves the underlying engineering of the carrier's network and the relevant SMS, NeuStar has endeavored to help the carriers and their SMS vendors identify a work-around that will prevent any backlog in data from compromising service.

Finally, we note that the issues raised at the March 25 LNPA WG meeting are not generated by volumes of transactions related to pooling or porting. The concerns discussed relate to the ability of the carrier's existing OSS technology to process backlogged data and are addressable through coordination among all of the industry parties in the ordinary course of business. The industry wisely elected to pull together a meeting last week, rather than wait several weeks for the next scheduled meeting of the LNPA WG. The March 25 LNPA WG meeting was intended to manage cross-industry issues on a timely basis, reflecting the industry's commitment to maintaining high-quality operations.

NPAC Performance and the Availability of Efficient Data Representation

In *ex parte* presentations at the FCC, NeuStar has described the extensive investments undertaken to upgrade the NPAC in anticipation of the transition to pooling and wireless local number portability. These investments already have shown results and continue to provide performance enhancements for the industry. For example, NPAC system performance in Release 3.1 is up more than 500% over Release 2.0, more than twice current contractual requirements. Specifically, this means that while Release 2.0 processed 4.7 TNs per second, Release 3.1 can process in excess of 25 TNs per second.

In the March 28 CTIA Letter, CTIA seems to suggest that Efficient Data Representation (EDR) capability, a feature of Release 3.0 is not stable. This is incorrect. EDR, a functionality of Release 3.0, has been in place since March 2001 in the Northeast Region and has been stable in its use for over one year. Release 3.0 was implemented in the Northeast Region in March 2001. The deployment of Release 3.1 addresses functionality unrelated to EDR and therefore does not impact the EDR functionality available in Release 3.0. Furthermore, EDR was designed to accommodate increased volumes. The March 28 CTIA Letter indicates that Release 3.1 allows a pooled thousands block to be broadcast by the NPAC to a carrier's SMS as a single entity rather than one thousand individual TNs. As discussed above, this functionality was available in Release 3.0 and has been in production in the Northeast for more than one year.

NeuStar Deployment of Release 3.1

Release 3.1 was ordered by the industry in Mid-2001. Contrary to the implication of the March 28 CTIA Letter, Release 3.1 was not developed because of problems or deficiencies associated with Release 3.0. Rather, Release 3.1 was ordered pursuant to an accelerated process to better enable carriers to process data at the increased speeds generated by the performance-enhanced NPAC. In fact, at no point was Release 3.0 abandoned. Release 3.0 was deployed in the Northeast Region and continued to operate there until Release 3.1 was installed in February 2002.

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The EDR functionality, available in Release 3.0, will now be installed in all other regions along with the implementation of Release 3.1.

Rather than deploy Release 3.0 nationally, carriers elected to develop Release 3.1, software that would enable their systems to handle the improved performance of the NPAC using the EDR functionality of Release 3.0. We acknowledge that there were delays in the initial implementation of Release 3.0, however, the decision not to roll it out nationally was made by the carriers for reasons unrelated to the original delivery dates. As stated above, because of the increased performance associated with Release 3.0, carriers instead opted to wait to deploy EDR functionality until a subsequent NPAC software release was available to assist carrier systems in handling increased NPAC volumes. This next generation, Release 3.1, has not experienced development delays. In addition, it is designed not to counter deficiencies with EDR or Release 3.0, rather, it enables carriers to adjust to the impact of the improved performance associated with Release 3.0.

The schedule for deploying Release 3.1 began with the successful on-time rollout of the Northeast Region in February of this year.⁴ The proposed pacing of the deployment schedule is not accelerated, contrary to the implication of the March 28 CTIA Letter. The schedule, as agreed by NeuStar and the industry, was designed to accommodate unforeseen developments along the way.

Adopt and Enforce a Testing Schedule

We note, however, that with highly complex technology such as the technology supporting the NPAC and today's wireless networks, unexpected issues often arise. As a technology company, NeuStar is aware that issues can develop, despite the best efforts of all parties involved. Because NeuStar appreciates that the unforeseeable can occur, we have repeatedly urged carriers to initiate early testing with us of Release 3.0 as well as Release 3.1. We also continue to urge the FCC, in anticipation of the November 24, 2002 deadline for wireless local number portability, to adopt a schedule for contacting and initiating testing with the NPAC. We believe that such testing is vital to the successful implementation of the FCC's objectives. A phased national roll out schedule was a critical component of our collective success in implementing wireline local number portability 5 years ago. Further, in our work supporting the industry groups in efforts to roll out portability and pooling, we have repeatedly urged testing not just with our databases, but also the critical intercarrier testing that will be required to accomplish the FCC's stated policy goals.

With this letter, we have endeavored to address the concerns raised in the March 28 CTIA Letter. The March 28 CTIA Letter and the March 28 VoiceStream Filing identify issues that must be addressed as we all work to implement the FCC's requirements. The March 25 LNPA WG meeting and our ongoing collaborative efforts with the carriers are all steps undertaken in the ordinary course of the business. The regularly scheduled and occasional interim sessions provide a critical forum for identifying technical and administrative solutions to issues that arise in the administration of local number portability. We will continue to work closely with the wireless carriers to help identify as early as possible any remaining technical barriers to successful

⁴ See LNPA Working Group, Status Report to NANC, March 12, 2002, Gary Sacra, ILEC Co-Chair.

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deployment of wireless pooling and portability and the ultimate achievement of the FCC's stated policy objectives.

Please contact the undersigned with any questions or comments regarding this letter or any additional concerns you may have regarding the NPAC's operations.

Sincerely,

/s/

Joseph F. Franlin
Senior Vice President, Operations

cc: Mr. Jim Schlichting
Mr. David Furth
Mr. Joel Taubenblatt
Ms. Kris Monteith
Mr. Jared Carlson
Mr. Patrick E. Forster
Mr. Jeffrey Carlisle
Ms. Diane Griffin
Ms. Cheryl Callahan